

**Department of Energy****Ohio Field Office  
Fernald Area Office****P. O. Box 538705  
Cincinnati, Ohio 45253-8705  
(513) 648-3155**

JUN 26 1997

DOE-1122-97

**Mr. James A. Saric, Remedial Project Manager  
U.S. Environmental Protection Agency  
Region V-SRF-5J  
77 West Jackson Boulevard  
Chicago, Illinois 60604-3590**

**Dear Mr. Saric:**

**BUILDING 4A COMPLEX DECONTAMINATION AND DISMANTLEMENT PROJECT  
COMPLETION REPORT COMMENT RESPONSES**

- References:**
- 1) Letter, J. Saric, U.S. EPA, to J. Reising, DOE, "4A Complex Project Completion Report RTC," May 23, 1997.**
  - 2) Letter, J. Reising, DOE, to J. Saric, U.S. EPA, "Building 4A Complex Project Completion Report, Revision 1," March 24, 1997.**

**This letter transmits responses and revised pages for the Building 4A Complex Decontamination and Dismantlement (D&D) Project Completion Report. The responses address the U.S. Environmental Protection Agency (U.S. EPA) comments received May 27, 1997. The responses also reflect the incorporation of feedback received in the meeting among the Department of Energy, Fernald Environmental Management Project (DOE-FEMP), U.S. EPA, and Fluor Daniel Fernald, Inc. (FDF) staff on June 16, 1997.**

**Following approval of the revisions shown in the comment response package, the redline/strikeout markings will be removed and the Project Completion Report will be prepared in final form for submittal and distribution.**

**If you have any questions, please contact John Trygier at (513) 648-3154.**

**Sincerely,**

**Johnny W. Reising  
Fernald Remedial Action  
Project Manager**

**FEMP:Trygier**

**Enclosure: As Stated**

## cc w/enc:

N. Hallein, EM-42/CLOV  
A. Shah, DOE-FEMP  
G. Jablonowski, USEPA-V, 5HRE-8J  
R. Beaumier, TPSS/DERR, OEPA-Columbus  
T. Schneider, OEPA-Dayton  
F. Bell, ATSDR  
D. S. Ward, GeoTrans  
R. Vandegrift, ODOH  
R. Geiger, PRC  
T. Hagen, FDF/65-2  
J. Harmon, FDF/90  
AR Coordinator/78

## cc w/o enc:

C. Little, FDF/2  
EDC, FDF/52-7

Comment responses to the U.S. EPA's letter of May 23, 1997, " Building 4A Complex Project Completion Report RTC," disapproving the Building 4A Complex Project Completion Report and related Response to Comments, submitted by DOE March 24, 1997

**COMMENT:** The DOE's response to Original Specific Comment No. 1 provides additional detail regarding collection and evaluation of wastewater generated during Decontamination and Dismantling (D&D) activities. However, DOE must identify the quantity of the combined project wastewater, including wastewater from safe shutdown activities, generated during the project.

**Response:** Table 2, Material Generation and RI/FS Material Category Crosswalk, states approximately 42,000 gallons of wastewater (wash water) were generated from the D&D activities. No wastewater was generated from the Safe Shutdown activities at Building 4A.

Safe Shutdown activities were performed between May 1994 and March 1995 and were not included in the scope of the Building 4A Complex Above-Grade D&D Project, which began field activities in May 1995. A Closeout Report for Safe Shutdown Projects will be submitted at the completion of Removal Action No. 12, Safe Shutdown.

**Action:** Section 2.1.2 will have a sentence added stating: "Safe Shutdown activities, completed prior to Implementation Plan field activities, will be included in the Removal Action No. 12 Safe Shutdown Close-out Report."

**COMMENT:** The DOE should also include a more detailed description of the temporary wastewater collection system used to collect safe shutdown and D&D wastewater, and a summary of the system's performance following D&D activities.

**Response:** Wastewater was generated only from D&D activities at Building 4A. No wastewater was generated from Safe Shutdown activities at Building 4A.

The temporary wastewater collection system was constructed and operated solely for the Building 4A D&D; the system was dismantled prior to building implosion. Thus, a summary of the performance of the system after D&D is not feasible.

**Action:** The paragraph highlighted below will be added to Section 3.1.2.

"The wastewater generated by high pressure/low volume washing of equipment and building interior was directed and collected into existing building sumps. The wastewater was pumped from the building sumps, using skid mounted pumps with a 20 micron pre-filter and a 5 micron filter, into one of the three 6,500 gallon holding tanks located in a temporary diked area located southwest outside Building 4A within the construction boundary zone. These holding tanks were sampled and the analysis reviewed prior to discharging the wastewater to the general sump retention basin. The water from the general sump was then pumped into Plant 8 for final treatment followed by discharge."

**COMMENT:** In addition, the DOE's response was not incorporated as revised text in Section 3.1.1.C of the project completion report.

**Response:** The DOE believes the responses were incorporated in the revision, Sentences 6 and 7 of Section 3.1.1.C.

**Action:** None.

**COMMENT:** In response to Original Specific Comment No. 4, DOE refers to Sitewide Waste Information, Forecasting, and Tracking System (*SWIFTS*) database reports that are included in Attachment C of the project completion report. The DOE must specify that the database reports summarize material management information only for the Building 4A Complex Report.

**Response:** Currently Section 3.2 states: "The Sitewide Waste Information, Forecasting, and Tracking System (SWIFTS) database was used to track the material generated from the Building 4A Complex D&D activities. Attachment C contains three of the many different SWIFTS reports that can be generated."

Each page of the attachment was labeled to indicate its connection to the Building 4A D&D project.

**Action:** Additional clarification will be provided by adding: "The SWIFTS database information included with this report is only for Building 4A Complex materials, as the reports were prepared using 'generator source: Building 4A D&D' as a query parameter."

**COMMENT:** Also, the DOE should clarify whether updated database reports summarizing the overall status of materials managed in interim storage are available for review.

**Response:** As with all data used for environmental tracking, DOE stands ready to provide the U.S. EPA with any information it has on record. SWIFTS reports identifying waste storage location by generating project can be produced on request.

Sitewide integrated material storage and handling issues are currently in discussion between the U.S. EPA and DOE. Individual projects will report and discuss the project-related material storage and handling.

**Action:** None.